

LAW OFFICE OF DANIEL MARKS
DANIEL MARKS, ESQ.
Nevada State Bar No. 002003
office@danielmarks.net
ADAM LEVINE, ESQ.
Nevada State Bar No. 004673
alevine@danielmarks.net
610 South Ninth Street
Las Vegas, Nevada 89101
(702) 386-0536; FAX (702) 386-6812
Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

JAMES LESCINSKY, individually and on
behalf of all similarly situated employees,

Case No.: 2:20-cv-00290-RFB-NJK

Plaintiff,

v.

CLARK COUNTY SCHOOL DISTRICT,
A political subdivision,

Defendant.

STIPULATION AND ORDER TO EXTEND
(First Request)

Plaintiff JAMES LESCINSKY (“Plaintiff”) and Defendant CLARK COUNTY SCHOOL DISTRICT (CCSD”), by and through their respective counsel hereby submit their first request of an extension of time to allow Plaintiff to Reply to CCSD’s Response in Opposition to Plaintiff’s Renewed Motion for Preliminary Certification of a Collective Action Under the Fair Labor Standards Act of 1938, 20 U.S.C. 201 et seq.; Motion for Information for the Potential Members of the Collective Action and to Assist in Providing the Requisite Notice for Such Action; and Motion for Plaintiff’s Counsel be Named as Interim Class Counsel (the “Motions”) [Doc Nos. 27, 28 and 29]

WHEREAS, Plaintiff filed the Motions on December 29, 2020 [Doc Nos. 24, 25, and 26];

WHEREAS, CCSD responded in Opposition to Plaintiff's Motions on January 12, 2021 [Doc Nos. 27, 28 and 29];

WHEREAS, Plaintiff's counsel has multiple briefs in various courts which are due currently on extensions;

WHEREAS, Plaintiff's reply to CCSD's responses in opposition to Plaintiff's Motions are due on January 19, 2021, no party will be prejudiced by a two-week extension of Plaintiff's time to reply to CCSD's responses in opposition to said Motions;

WHEREFORE, IT IS HEREBY STIPULATED between Plaintiff and counsel for Defendant CCSD that Plaintiff's deadline to file and serve its Reply is extended up to and including February 2, 2021.

This stipulation is requested in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 20th day of January 2021.

DATED this 20th day of January 2021.

LAW OFFICE OF DANIEL MARKS

GREENBERG TRAURIG, LLP

/s/Adam Levine, Esq.
ADAM LEVINE, ESQ.
Nevada State Bar No. 004673
alevine@danielmarks.net
610 South Ninth Street
Las Vegas, Nevada 89101
*Attorneys for Plaintiff(s) James Lescinsky, individually
and on behalf of all similarly situated employees*

/s/Kara B. Hendricks, Esq.
KARA B. HENDRICKS, ESQ.
Nevada Bar No. 7743
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
*Attorneys for Defendant Clark County
School District*

IT IS SO ORDERED.

Dated: January 21, 2021


United States Magistrate Judge